To Whom It May Concern:

      Dangerous Goods Council© requests that the proposed regulations be amended in the following ways. The Federal Aviation Administration ("FAA") should also certify on-site instructors as well as "**electronic instructors**" with **on-line** programs available real time via the **web**. In meeting the FAA requirements for a classroom instructor the "electronic instructor" would be immediately available via Instant Message (IM), E-mail, or phone. The web based "electronic instructor" would be much more **cost effective** than on-site or off-site group training. The employee being trained would be able to start and stop the training at their convenience.   If they do fail a module they will be given the opportunity to review and retake any module and test they had problems with.

      We also believe that the economic situation of most companies will be unable to meet the FAA requirements in a timely manner unless they have immediate access to an **affordable** on-line training program. On-line training would save an immense amount of money for both the FAA and the companies taking the training. On-line training would also be easily **accredited** by the FAA since it is always available 24-hours a day for review at any time.

      On-line/interactive training would easily meet the requirements of record keeping by the FAA since the training would be consolidate in one location for many companies and **easily reviewed** by the FAA. On-line web training is widely used by many universities and **cutting edge** companies and should be accepted by the FAA as a valid form of training.

Sincerely,

Neil Wrobleski & Mario Gordon
Dangerous Goods Council
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